

Original

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OCT 31 2016

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

Middle DIVISION

U.S. DISTRICT COURT
MID. DIST. TENN.

Michael D. Robinson

(Name)

232452

(Prison Id. No.)

N/A

(Name)

N/A

(Prison Id. No.)

Plaintiff(s)

v.

① Sean Brantley

(Name)

② Kelly Garska

(Name)

③ Correction Corporation of America (CCA)

Defendant(s)

④ Cherry Lindamood

⑤ JASON WOODALL

(List the names of all the plaintiffs filing
this lawsuit. Do not use "et al." Attach
additional sheets if necessary.)

Civil Action No. _____
(To be assigned by the Clerk's Office.
Do not write in this space.)

JURY TRIAL REQUESTED ☒ YES ☐ NO

(List the names of all defendants
against whom you are filing this
lawsuit. Do you use "et al." Attach
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS FILED
PURSUANT TO 42 U.S.C. § 1983

I. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff:

Michael D. Robinson

Prison I.D. No. of the first plaintiff: 232452

Address of the first plaintiff: South Central Corr. Facility, P.O. Box 279
Clifton, TN. 38425-0279

Status of Plaintiff: CONVICTED ☒ PRETRIAL DETAINEE ☐

2. Name of the second plaintiff:

N/A

Prison I.D. No. of the second plaintiff:

N/A

Address of the second plaintiff: N/A

Status of Plaintiff: CONVICTED ☐ PRETRIAL DETAINEE ☐

IN The United States District Court
For The Middle District of Tennessee
MIDDLE Division

1. Michael D. Robinson)

(NAME))

232452)

(Prison Id. No.))

Civil Action No. _____

2. N/A)

(NAME))

N/A)

(Prison Id. No.))

Jury Trial Requested ☒ yes - ☐ no

Plaintiff(s))

V.

1. Sean Brantley - (NAME)

2. Kelly Garska - (NAME)

3. Corrections Corporation of America (CCA) - (NAME)

4. Cherry Lindamood - (NAME)

5. Jason Woodall - (NAME)

Defendant(s)

(Include the name of the institution and mailing address with zip code for each plaintiff. If any plaintiff changes his or her address, he or she must notify the Court immediately. If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.)

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Sean Brantley
 Place of employment of the first defendant: South Central Corr. Facility (CCA)
 First defendant's address: South Central Corr. Facility (CCA) 555 Forrest Ave.
P.O. Box 279 - Clifton, Tennessee. 38425-0279
 Named in official capacity? ☒ Yes ☐ No
 Named in individual capacity? ☒ Yes ☐ No
2. Name of the second defendant: Kelly Garska
 Place of employment of the second defendant: South Central Corr. Facility (CCA)
 Second defendant's address: South Central Corr. Facility (CCA) 555 Forrest Avenue.
P.O. Box 279 - Clifton, TN. 38425-0279
 Named in official capacity? ☒ Yes ☐ No
 Named in individual capacity? ☒ Yes ☐ No

(If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, his or her place of employment, address, and the capacity in which you are suing that defendant. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide each defendant's proper name, place of employment, and address, the Clerk will be unable to serve that defendant should process issue.)

II. JURISDICTION

- (A.) Jurisdiction is asserted pursuant to 42 U.S.C. § 1983 (applies to state prisoners).
Jurisdiction is also invoked pursuant to 28 U.S.C. § 1343(a)(3).

If you wish to assert jurisdiction under different or additional statutes, you may list them below:

Defendant(s) against whom this lawsuit is being brought:

3.
 - Name of the third defendant: Cherry Lindamood
 - Place of employment of the third defendant: South Central Correctional Facility (CCA).
 - Third defendant's Address: South Central Correctional Facility (CCA), 555 Forrest Avenue, P.O. Box 279, Clifton, TN, 38425-0279.
 - NAMED in official capacity ☒ yes ☐ No
 - NAMED in individual capacity ☒ yes ☐ No

4.
 - Name of the fourth defendant: Corrections Corporation of America (CCA).
 - Place of employment of the fourth defendant: Corrections Corporation of America (CCA).
 - South Central Correctional Facility (CCA).
 - Fourth defendant's Address: Corrections Corporation of America (CCA) USA.
 - NAMED in official capacity ☒ yes ☐ No
 - NAMED in individual capacity ☒ yes ☐ No

5.
 - Name of the fifth defendant: Jason WoodALL
 - Place of employment of the fifth defendant: Department of Corrections (D.O.C.)
 - Fifth defendant's Address: 320^{6th} Avenue, North, Nashville, TN. 37243-0465
 - NAMED in official capacity ☒ yes ☐ No
 - NAMED in individual capacity ☒ yes ☐ No

III. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuit(s) in the United States District Court for the Middle District of Tennessee, or in any other federal or state court? ☐ Yes ☒ No

B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs N/A

Defendants N/A

2. In what court did you file the previous lawsuit? N/A

(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)

3. What was the case number of the previous lawsuit? N/A

4. What was the Judge's name to whom the case was assigned? N/A

5. What type of case was it (for example, habeas corpus or civil rights action)? N/A

6. When did you file the previous lawsuit? (Provide the year, if you do not know the exact date.) N/A

7. What was the result of the previous lawsuit? For example, was the case dismissed or appealed, or is it still pending? N/A

8. When was the previous lawsuit decided by the court? (Provide the year, if you do not know the exact date.) N/A

9. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit? ☐ Yes ☒ No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

IV. EXHAUSTION

A. Are the facts of your lawsuit related to your present confinement?

☒ Yes ☐ No

B. If you checked the box marked "No" in question III.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain. South Central Correctional Facility, 555 Forrest Avenue, P.O. Box 279 - Clinton, TN. 38425-0279 - (CCA)

C. Do the facts of your lawsuit relate to your confinement in a Tennessee state prison?

☒ Yes ☐ No

(If you checked the box marked "No," proceed to question IV.G. If you checked the box marked "Yes," proceed to question IV.D.)

D. Have you presented these facts to the prison authorities through the state grievance procedure? ☒ Yes ☐ No

E. If you checked the box marked "Yes" in question IV.D above:

1. What steps did you take? I filed a grievance against Sgt. Sean Brantley Abuse of Authority. I appealed it to the Deputy Commissioner.
2. What was the response of prison authorities? S/O Brantley & C/O Garska escorted Mr. Robinson as instructed by procedures.

F. If you checked the box marked "No" in question IV.D above, explain why not. N/A

G. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)? ☐ Yes ☒ No

H. If "Yes" to the question above, have you presented these facts to the authorities who operate the detention facility? ☐ Yes ☒ No

I. If you checked the box marked "Yes" in question IV.H above:

1. What steps did you take? N/A

2. What was the response of the authorities who run the detention facility? N/A

J. If you checked the box marked "No" in question IV.H above, explain why not. Not in a detention. I am a state prisoner, housed by (CCA) privately own facility.

V. CAUSE OF ACTION

Briefly explain which of your constitutional rights were violated:

My Eighth Amendment Constitutional right to be protected from assault, neglect, - Cruel and unusual punishment inflicted. Civil Rights violation.

VI. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 1/2 inch x 11 inch paper. Write on one side only, and leave a 1-inch margin on all 4 sides.

On June 22, 2016 at South Central Corr. Facility in skylab-HB-pod at cell 213. On that day I was assaulted by a senior officer name Sean Brantley. He through me up against the wall before shoving me from behind with unnecessary and excessive force, into my cell 213. I was shoved from behind with so much force I flew across my cell into the floor, where I cut my arm and my wrist from being still in handcuffs and belly-chain. My arm and wrist bled from the fall of the assault. C/O Garska participated in this assault by slamming the door in my face when I regain my standing position. C/O Garska also denied witnessing her co-officer or senior officer shoving me or assaulting me on June 22, 2016. The assault caused my stabbing wound in my stomach ~~causing~~ such great pain, I had to lay in bed the remainder of the next 2 days. C/O Garska denied me medical attention by ignoring my cry for emergency medical attention for my wounds and my stomach wounds from being stabbed on May 5, 2016. The assault or should I say the unnecessary and excessive force used by Sean Brantley would appear to be on video footage in front of cell 213 in skylab-HB-pod. → Contine

- My grievance was denied of my requested solution by the warden Cherry Lindamors of South Central Corr. Facility on 7-26-16. Corrections Corporation of America (CCA) the
- Deputy Commissioner represented (CCA) by denying my requested solution for the Abuse of Authority by this staff member, senior officer Sean Brantley ID. No# 1502774. The Deputy Commissioner representing (CCA) name is Jason Woodall. Jason Woodall denied my requested solution on 8-15-2016.
- Jason Woodall handles the issues or grievances for privately run prisons (CCA).

Statement of Claims 1[#] AND 2[#] (VI)

- 1[#] • Against- Sean Brantley - ON June 22, 2016.
- 2[#] • Against- Kelly Garska - ON June 22, 2016.

I Michael D. Robinson # 232452, the only plaintiff, AN inmate at South Central Correctional Facility (CCA); in Clifton, Tennessee! During morning showers in Skylab unit, HB-pod. I was escorted to the shower in HB-pod from cell 213, upstairs in the corner by two officers. Those two officers NAME were C/O Garska who was in control of the pod for the day of June 22, 2016! The other officer's NAME WAS C/O JAMES. As these two officers, C/O Garska AND C/O JAMES escorted myself to the shower from cell 213, I WAS placed in shower 117. The restraints were taking off MY wrist AND from around MY waist at around 8:30 a.m.! When C/O Garska returned to the showers AT around 10:45 a.m. I think? C/O Garska had with her a sargent Brantley. I along with two other inmates started complaining of being left in showers by C/O Garska for such very long time. As I was being placed back into handcuffs AND belly-chains by C/O Garska to be escorted back to my cell 213 by herself, C/O Garska AND Sargent Brantley. Sargent Brantley AND myself had words concerning following policies AND rules of shower time-limits! As the three of us reach close to my cell door, I was thrown up Against the wall by sargent Brantley while I still WAS in handcuffs AND belly-chain on my body for NO reason! C/O Garska then unlocked my cell door 213. I was released from sargent Brantley's great force! I then proceeded to walk away from sargent Brantley with my back turned

facing Sargent Brantley. As I was entering my cell door 213 with my shower-bag in hand AND my flip-flops on; I felt a "great" force of power push me from behind in my back while I still had handcuffs AND belly-chain on my body! I slid across the cell in my shower flip-flops into the wall extremely hard, then into the floor. I scraped my elbow against the wall. I also cut my wrist from the handcuffs tighten up from the crash into the floor. I bled very badly from my elbow AND my wrist. As well my two stab wounds in my stomach I sustained on May 5, 2016 a month 1/2 before this incident, started cramping very badly. I then arose to my feet AND went to the door to have the handcuffs AND belly-chain removed from my body; threw the door-flap. Then I climbed into my bed in great pain AND still bleeding. I lay there two days crying for medical attention to C/O Garska as she brought my trays to my flap on my door. I WAS completely ignored! All this would appear on video footage for the day of June 22, 2016. I request the footage of the day of June 22, 2016 in skylab-HB-pod in front of cell 213, to be subpoenaed by motion of evidence!

- 1# • Claims Against: SEAN Brantley -
- 1) UNNECESSARY AND EXCESSIVE FORCE
 - 2) UNPROFESSIONAL CONDUCT
 - 3) ABUSE OF AUTHORITY
 - 4) RECKLESS BEHAVIOR
 - 5) CRUEL AND UNUSUAL PUNISHMENT INFLICTED
 - 6) ASSAULT
 - 7) EIGHTH AMENDMENT CONSTITUTIONAL - RIGHTS VIOLATED.

Claim 1[#] Against: SEAN Brantley

1. UNNECESSARY AND EXCESSIVE FORCE - I WAS THROWN UP AGAINST THE WALL FOR NO REASON BEFORE I ENTERED MY CELL 213 ON JUNE 22, 2016 IN SKYLAB-HB-PID, WHILE I HAD HANDCUFFS ON MY WRIST AND BELLY-CHAIN WRAP AROUND MY WAIST TO ASSURE NO HARM TO ANYONE. I ALSO WAS PUSHED WITH SO MUCH FORCE BY S/O SEAN BRANTLEY INTO MY CELL 213, WHILE MY BACK WAS TURNED AWAY FROM THIS SARGENT BRANTLEY.
2. UNPROFESSIONAL CONDUCT - TO PUSH ME WHILE MY BACK WAS TURNED TO S/O BRANTLEY.
3. ABUSE OF AUTHORITY - TO PUSH ME WHILE MY BACK WAS TURNED TO S/O BRANTLEY.
4. RECKLESS BEHAVIOR - TO THROW ME UP AGAINST THE WALL. ALSO, TO PUSH ME INTO CELL 213 WITH GREAT FORCE WHILE MY BACK WAS TURNED, AND MYSELF IN HANDCUFFS AND A CHAIN WRAPPED AROUND MY WAIST TO ASSURE NO HARM TO ANYONE.
5. CRUEL AND UNUSUAL PUNISHMENT INFLICTED - TO PUNISH ME FOR STATING RULES OF POLICIES CONCERNING HOW OFFICERS ARE TO GIVE SHOWERS. IT WAS VERY CRUEL -

5. to push me into A wall in my cell 213 while I WAS still in handcuffs AND chain.

6. Assault - Too excessive force from the push became A Assault ON MYSELF, when I became harmed by bleeding from my elbow AND my wrist. The sight of AN open wound AND blood coming from my Arm made the attack AN Assault.

7. Eighth Amendment Constitutional Rights Violated. —
To be protected from Assault, or my Eighth Amendment —
— Constitutional Rights being violated, from Cruel AND Unusual Punishment Inflicted upon me for NO reason at all.

- 2# • Claims Against: Kelly Garska -
- 1) Negligent
 - 2) Unprofessional Conduct
 - 3) Cruel AND Unusual Punishment -
- Inflicted.
 - 4) Eighth Amendment Constitutional -
- Rights Violated.

END of CLAIMS AGAINST: 1# Sean Brantley
2# Kelly Garska

Claim 2[#] Against: Kelly Garska

1. Negligents - When C/O Garska left myself in the shower in skylab-HB-pod, for over 2 hours possibly without concern. Also, negligent for ignoring my cry for medical attention for my wounds from her Sargent Brantley. My wounds include my elbow, my wrist, also my stab wounds, I sustained in my stomach on May 5, 2016. My stomach wounds which are (two) deep stab wounds in my abdominal area, which was in great pain. I notified of my conditions from the assault to C/O Garska.
2. Unprofessional Conduct - To participate in the assault by slamming door in my face AND never mentioning the assault to higher staff.
3. Cruel AND Unusual Punishment Inflicted - Never reporting I need medical attention. It was very cruel to ignore my cry for help.
4. Eighth Amendment Constitutional Rights Violated - Cruel AND Unusual Punishment Inflicted.

Statement of Claims 3[#] AND 4[#]

3[#] •



Against- Cherry LINDAMOOD - On July 28, 2016. My appeal to the warden for my requested solution on grievance no[#] 23832-303895 - Abuse of Authority, by Sean Brantley; employee of South Central Correctional Facility (CCA). My appeal was denied due to response to concur with BOARD AND Supervisor, by (WARDEN) Cherry LINDAMOOD. There was NO reason; stated of why warden Cherry LINDAMOOD Agreed with the board AND supervisor's response. No demonstration of A concerned investigation speaking about from the (WARDEN) Cherry LINDAMOOD. Just A concur with BOARD AND Supervisor. No legitimate reason of why my requested solution was denied. My requested solution was to move S/O Brantley out of his comfort-zone (Skylab-unit), to another area of the prison for my safety.



•

Claims Against: Cherry LINDAMOOD - ¹ Deliberate Indifference, ² Negligents.

4[#] •



Against- Corrections Corporation of America (CCA) - Is responsible for its employees from Deputy Commissioner of Operations Jason Woodall, the WARDEN of South Central Correctional Facility Cherry LINDAMOOD, to the remainder of its staff AND employees. South Central Corr. Facility (CCA) employees violated my rights.



•

Claims Against: Corrections Corporation of America (CCA) - ¹ Eighth Amendment Constitutional Rights Violated -

²

Cruel AND Unusual Punishment Inflicted.

Claim 3[#] Against: Cherry Lindamood

1. Deliberate Indifference - To deny my requested solution to solve problem between her sargent. Cherry Lindamood felt no need to investigate the Abuse because she disagreed there was abuse from sargent SEAN Brantley on June 22, 2016 in skylab-HB-pod at cell 213.
2. Negligents - To not show concern for her inmates safety.

CLAIM 4[#] Against: Corrections Corporation
OF America (CCA).

- 1. Eighth Amendment Constitutional Rights Violated -
Cruel AND Unusual Punishment Inflicted on
myself by S/O Sean Brantley ID. No. 1502774.
2. Cruel AND Unusual Punishment Inflicted - Allowing
its (CCA) staff to do things to myself without any
consequences.

Statement of Claims 5#

5# •



Against - Jason Woodall - On August 15, 2016. My appeal was denied by Deputy Commissioner of Operations Jason Woodall. Jason Woodall concurred with Warden Cherry Lindamood's decision to deny my appeal of my requested solution on grievance no# 23832-303895 - Abuse of Authority - by Sean Brantley; employee of South Central Corr. Facility (CCA). My requested solution was to move S/C Brantley out of his comfort-zone (Skylab-unit), to another area of the prison for my safety.



5# •

Claims Against: Jason Woodall -
1 Deliberate Indifference,
2 Negligents.

Claim 5[#] Against: JASON WOODALL

1. Deliberate Indifference - To deny my requested solution to solve problem between (CCA) AND (warden) Cherry LINDAMOOD's sargent Brantley -
- NO. 1502774, because he felt no need to investigate the alleged Abuse of Authority.
2. Negligents - To not show concern for [REDACTED] my safety here at South Central Correctional Facility in skylab-HB-pod.

The END of ALL 5 claims.

VII. **RELIEF REQUESTED:** State exactly what you want the Court to order each defendant to do for you.

I request Sean Brantley and Kelly Garska be reprimanded and therewith relieved of their staff, title and duties, as a result of their negligent and unprofessional conduct and their reckless behavior which caused me to be assaulted and neglected of medical attention. I request that I receive [Punitive; monetary damages] in a sum of my choice of \$15,000 apiece from both of them for the pain and suffering I experienced due to their recklessness. Also reprimanded as a result of unnecessary and excessive force as well as abuse of authority, Also neglect for being left in showers for uncertain amount of time!

I request a jury trial. ☒ Yes ☐ No

VIII. **CERTIFICATION**

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: Michael Robinson Date: 10-29-2016
Prison Id. No. 232452

Address (Include the city, state and zip code.): South Central Corr. Facility-555 Forrest Avenue
P.O. Box 279 - Clifton, Tennessee 38425-0279

Signature: N/A Date: N/A
Prison Id. No. N/A
Address (Include the city, state and zip code.): N/A

ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information requested above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS, if not paying the civil filing fee.

SUBMIT THE COMPLAINT AND (1) THE REQUIRED FILING FEE OR (2) COMPLETED APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES AND COSTS TOGETHER. Complaints received without the required filing fee or application to proceed without prepayment of fees will be returned. Filing fees and applications to proceed without prepayment of fees submitted without a complaint will be returned.

VII. Relief Requested

- 1# • Sean Brantley: To be reprimanded from staff, title, and duties, as a result of his UNNECESSARY AND Excessive force, unprofessional conduct, reckless behavior, Abuse of Authority. I request all disciplinaries from 6-22-16, on up to my release from SKYlab with his NAME involved, deleted from record (prison) S.C.C.F., due to him retaliating against me for filing grievance on him for Abuse of Authority. I also request in the "SUM" of 175,000 in - punitive; Monetary damages - as well in my PAIN AND Suffering. All these claims come from pushing me from behind with great force!

- 2# • Kelly Garska: To be reprimanded from staff, title, and duties, as a result of her Negligent of being left in showers for uncertain long periods over an 1 hour and 45 minutes time frame! As well her Negligent of medical attention on 6-22-16, after cry for help behind assault on myself by Sean Brantley. I also request in the "SUM" of 175,000 in - punitive; Monetary damages - as well in my PAIN AND Suffering.

- 3# • Cherry Lindamood: To resign from title (WARDEN), OR step down to less position in title, AND duties! Deliberate Indifference because she did not feel my grievance deserved my requested solution. I also request in the "SUM" of 175,000 in - punitive; Monetary damages - in my PAIN AND Suffering.

- 4# • Corrections Corporation of America (CCA): CCA - is responsible for its employees from Deputy Commissioner of Operations JASON WOODALL, to the WARDEN of South Central Correctional Facility Cherry LINDAMOOD, to the remainder of its staff and Employees. Deliberate Indifference because (CCA) failed to honor my requested solution stated on grievance filed on -

VII. Relief Requested

- Abuse of Authority from its employee! I also request in the "sum" of 2.5 million [#]2,500,000.00-in punitive; Monetary damages- as well in my PAIN AND SUFFERING.

- 5[#] • JASON WOODALL: Letter of Apology for not honoring my requested solution on my grievance filed on Abuse of Authority by staff member Sean Brantley. Deliberate Indifference, Negligent Actions. I also request in the "sum" of 175,000 in-punitive; Monetary damages- as well in my PAIN AND SUFFERING.

IN The United States District Court
For The Middle District Of Tennessee
Middle Division

MICHAEL D. ROBINSON

Plaintiff/Petitioner

Civil Action No. _____

v.

CORRECTIONS CORPORATION OF AMERICA

Defendant/Respondent

↓ ↓

Request / Questions

- I request that the footage of S/O Sean Brantley and C/O Garska escorting me from the shower at around 10:30 A.M. on 6-22-16 in Skylab-HB-213 pod, be subpoena to be reviewed for those complaints of unprofessional conduct, Abuse of Authority, unnecessary and excessive force, reckless behavior, Assault, Negligents.
- Why is there ^{No.} incident no# on this incident statement?
 If it was filled out, then there was an incident!!
 Everything else on this incident statement is somewhat filled out, but no incident no# to track the incident??
- Why is the Deputy Commissioner appeal returned to me on 8-15-16 so late? I recieved it back on 9-7-16.
 I should of recieved the notification of the appeal in August somewhere after the 15th of August. There was a delay for some strange reason! Why??
- I request the footage of me coming out of my cell 213-HB-pod going to the shower and the exact time I was taking out of the shower to lead to the assault on me by S/O Sean Brantley? How long did I get left in the shower?? This would be why I complained to S/O Sean Brantley and C/O Garska. This complaint led to the assault on me as I was assaulted. This would also show the neglect from being left in the showers for over the 15 minutes standing by C/O Garska.

↓ ↓
Request // Questions

- Why was the door quickly slammed by C/O Garska after the excessive force was used on me??
- Why wasn't the footage on 6-22-16, not reviewed by another staff member?? ~~If~~ it was reviewed; who reviewed it??
- I request that C/O Garska be questioned on the day of 6-22-16, to see if she will lie to save her co-officer??
I want her to know that the footage was watched!
- My question to her is did S/O Sean Brantley use a great amount of unnecessary and excessive force on Michael Robinson as he entered his 213, from the shower as she C/O Garska opened my door??
- My question to C/O Garska is how long did Mr. Robinson stay locked in the shower?? Count the time I was locked in the shower to the time I was released from the shower?? Would be on count on video footage of the day 6-22-16. SKylab-HB-213 POD.
- • • I request all legal documents mailed back to me ^{for} answer from courts to require my signature upon receiving documents to prevent any disruption or delay of time-frame of documents needed back from courts. I request the date I signed documents

Signature: Michael Robinson

↓ ↓
Request / Questions

• I request S/O Sean Brantley ID. No# 1502774 employee file to be reviewed for all incidents involving inmates. This review could help my case show constant wrong doing by S/O Sean Brantley ID. No# 1502774. And why he has continuously gotten away with his wrong doings?

• I also request C/O Garska employee file to be reviewed for complaints against C/O Garska! And all grievances placed on C/O Garska for leaving inmates in the showers for uncertain amount of times. How many grievance complaints does C/O Garska have on her for leaving inmates in the showers for long periods of time deliberately? This would prove Negligent on a regular for C/O Garska.

• • • These 2 request, I would like to subpoena motion for review of employee files and all grievances placed on S/O Sean Brantley and C/O Kelly Garska, to show patterns of disruption and constant corruption by these (2) CCA-staff employees.



TENNESSEE DEPARTMENT OF CORRECTION

INMATE GRIEVANCE

2016 SEP 23 AM 10:06

DEPARTMENT OF CORRECTION
COMMISSIONER'S COMPLEX

Reg / SST
w/ m Stagg

Michael Robinson

NAME

23245a

NUMBER

S.C.C.F. (HB-213)

INSTITUTION & UNIT

DESCRIPTION OF PROBLEM:

Abuse of Authority - On June 22, 2016
At Around 10:30 A.M. SENIOR BRANLEY escorted me from
the shower in restraints - Handcuffs, Belly-chain. As I

REQUESTED SOLUTION:

Place SENIOR BRANLEY at another post on this
compound outside his comfort zone which is Skylab. This would
make Skylab a more peaceful environment for everyone!!

Michael Robinson

Signature of Grievant

6-24-2016

Date

TO BE COMPLETED BY GRIEVANCE CLERK

23832/303895

Grievance Number

7-8-16

Date Received

Sgt Stagg

Signature Of Grievance Clerk

INMATE GRIEVANCE COMMITTEE'S RESPONSE DUE DATE: _____

AUTHORIZED EXTENSION: _____

New Due Date

Signature of Grievant

INMATE GRIEVANCE RESPONSE

Summary of Supervisor's Response/Evidence:

Per Sco Brantley, he & 40 Garska
did escort 4m as instructed by procedures.

Chairperson's Response and Reason(s):

Concur with supervisor.

DATE: 7-13-16

CHAIRPERSON:

Sco Stagg

Do you wish to appeal this response?

YES

NO

If yes: Sign, date, and return to chairman for processing within five (5) days of receipt of first-level response.

Michael Robinson

GRIEVANT

7-15-2016

DATE

Sgt Stagg

WITNESS

Distribution Upon Final Resolution:

White - Inmate Grievant Canary - Warden Pink - Grievance Committee Goldenrod - Commissioner (if applicable)



TENNESSEE DEPARTMENT OF CORRECTION

INMATE GRIEVANCE

(continuation sheet)

Garska

~~Garska~~

DESCRIPTION OF PROBLEM: WAS AWAITING FOR C.O. GARLAND TO OPEN MY DOOR, I WAS PUSHED FORCIBLY INTO THE WALL. WHEN MY CELL DOOR WAS OPEN BY C.O. GARLAND. SENIOR BRANLEY TOOK BOTH OF HIS HANDS IN PUSHED MY BACK INTO MY CELL WITH SO MUCH FORCE, I FELL AND CUT MY ARM WHILE I WAS IN SHOWER SHOES. THEN MY DOOR WAS SLAMMED. A MONTH AGO I WAS STABBED IN THE STOMACH. SENIOR BRANLEY CAUSED MY STOMACH "GREAT PAIN," TO THE POINT WHERE I HAD TO LAY IN THE BED FOR THE REST OF THE DAY. ALL OF THIS IS ON PELCO VIDEO MONITOR FOR THE DAY OF JUNE 22, 2010 IN SKYLAB-HB-213 IN THE INMATE HANDBOOK 2014 ON PAGE 2. IT STATES EACH OF US, STAFF AND INMATES ALIKE, HAS A RESPONSIBILITY TO MAKE CHOICES WHICH PRODUCE A POSITIVE ENVIRONMENT. SENIOR BRANLEY MADE A BAD CHOICE BY PUSHING & ASSAULTING ME ON PELCO VIDEO MONITOR. THERE IS NO ROOM FOR THAT KIND OF BEHAVIOR OR DISRESPECT FROM AN EMPLOYEE OF CORRECTIONS CORPORATION OF AMERICA. THIS NEEDS TO BE CORRECTED I BELIEVE BY PLACING SENIOR BRANLEY AT ANOTHER POST ON THIS COMPOUND, OUTSIDE OF HIS COMFORT ZONE, WHICH IS SKYLAB. AT LEAST WHILE I AM HERE AT PRISON IN SOUTH CENTRAL. IF THIS DECISION NEEDS TO REACH AN HIGHER AUTHORITY, I WILL BE GLAD TO REACH OUT TO THEM...

GRIEVANCE HEARING SUMMARY

DATE: July 21, 2016 Grievance #: 303895-23832

Grievant: I/m Robinson, Michael #232452

Present:	Leigh Staggs	Grievance Coordinator
	Connie Benson	Staff Board Member
	Gail LaComb	Staff Board Member
	I/m Heard #337117	I/m Board Member
	I/m	I/m Board Member
	I/m Ridley #202670	I/m Grievance Clerk

Grievant enters: The Chairperson read the grievance, the Supervisor's response and Grievant's requested solution.

1. Procedures were explained. *Nothing was explained*

B. This complaint on: Unprofessional conduct of Sgt. Brantley. *Never filed a complaint on.*
I filed grievance on
(Abuse of Authority.)

Grievant comments:
Inmate had no comments.

Board Questions:
Board had no questions.

Hearing was concluded.

Review Video footage
for date and time of
incident

Griev # 303895-23832
Robinson # 232452

INCIDENT STATEMENT

NO Incident Number? ^{5-1C}

Facility SCC Incident Number

Incident Date 7-11-16 ^{Real incident date is 6-22-16} Incident Time (HRS) 1030 ^{Wrong time}

Person Name	ID Number (Employee #/Inmate #/Civilian ID)	Person Type (Employee/Inmate/Civilian)	Person Role (Witness or Participant)
Sean Brantley	1562774	Employee	Participant

Housing Location (For Inmates/Residents Only)

Based on your own knowledge, what did you see, hear, and do? In response to Grievance # 303895/23832 filed on 6-24-2016 by FM Robinson # 232452 HB(213), I sco Brantley and 1/0 Garrocy escorted FM Robinson from the shower to his cell on top walk in B Pod. FM Robinson then was placed in his cell and the restraints were taken off with out incidents.

Did you receive any injuries? YES or NO (If YES, Explain Below) NO

Were you evaluated by medical? YES or NO NO

Printed Name:	Sean Brantley	Date:	7-11-16
Signature:	<i>[Signature]</i>	Date:	
Typed By:		Date:	

This section to be completed by CCA staff if the civilian/other or inmate/resident refused to complete the 5-1C:

Place an "X" in the appropriate box:

<input checked="" type="checkbox"/>	Inmate/Resident refused to complete this 5-1C
<input type="checkbox"/>	Civilian/Other refused to complete this 5-1C

Employee/Witness Printed Name		Date:	
Employee/Witness Signature			

Employee/Witness Printed Name		Date:	
Employee/Witness Signature			



TENNESSEE DEPARTMENT OF CORRECTION
RESPONSE OF SUPERVISOR OF GRIEVED EMPLOYEE OR DEPARTMENT

Reg/SST
W/m Staggs

DATE: 7-8-16

Please respond to the attached grievance, indicating any action taken.

Date Due: 7-13-16

303895/23832
Grievance Number

Robinson, Michael
Inmate Name

232452
Inmate Number

6 S/O Brantley & Y/Garska escorted Y/m Robinson as instructed by procedures.

R Staggs
SIGNATURE

7-11-16
DATE

Her statement

Reg/ SST
ym Staggs



TENNESSEE DEPARTMENT OF CORRECTION
INMATE GRIEVANCE RESPONSE

Michael Robinson 232452 JCCF HB-213 23832-303895
NAME NUMBER INSTITUTION & UNIT GRIEVANCE NUMBER

Summary of Evidence and Testimony Presented to Committee Grievance requested solution & Supervisor response was read.

7

Inmate Grievance Committee's Response and Reasons. Board concurs with Supervisor.

7-21-16 S. J. Staggs w/c LaComb
DATE CHAIRMAN MEMBER
Conni Bera T. Heard [Signature]
MEMBER MEMBER MEMBER

Warden's Response: Agrees with Proposed Response ☒
Disagrees with Proposed Response ☐
If Disagrees, Reason(s) for Disagreement _____

Action Taken: _____
DATE: 7-26-16 WARDEN'S SIGNATURE: [Signature]
Do you wish to appeal this response? X YES _____ NO
If yes: Sign, date, and return to chairman for processing. Grievant may attach supplemental clarification of issues or rebuttal/reaction to previous responses if so desired.
Michael Robinson 7-28-2016 S. J. Staggs
GRIEVANT DATE WITNESS

Commissioner's Response and Reason(s): _____

DATE SIGNATURE

619



MEMO

Inmate Name: Michael Robinson TDOC Number: 272452
Institution: SCF Housing Unit: HA-213
Institution Grievance Number: 2383L TOMIS Grievance Number: 303890

Commissioner's Response and Reasons:

2 The response of the Committee is appropriate.

8. The grievant failed to substantiate allegation(s) presented to the satisfaction of the Grievance Committee. Additional information has not been presented which indicates the Level 2 response was inappropriate

☒ Concur with Warden ☐ Concur with Supervisor ☒ Appeal Denied

8. 8-15-16
Date

Frankland 7
Deputy Commissioner of Operations

TP-10

9
SEP 07 2016
BY: LS

Department of Correction • 6th Floor Rachel Jackson Building • 320 Sixth Avenue North •
Nashville, TN 37243 • Tel: 615-253-8180 • Fax: 615-253-1668 • tn.gov/Correction

Received response from Leigh Stagg 23 days later
after 8-15-16. Why??